



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 01 2011

REPLY TO THE ATTENTION OF:

E-19J

Marisol Simon
Regional Administrator, Region 5
Federal Transit Administration
200 West Adams Street, Suite 2410
Chicago, Illinois 60604

Re: **Comments on the Final Environmental Impact Statement for the
Woodward Avenue Light Rail Transit Project, Detroit,
Wayne County, Michigan CEQ#20110206**

Dear Ms. Simon:

In accordance with U.S. Environmental Protection Agency responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Final Environmental Impact Statement (FEIS) for the Detroit Woodward Avenue Light Rail Transit Project. EPA participated in early scoping for this project, and provided comments on the Draft Environmental Impact Statement (DEIS) on March 14, 2011.

Four build alternatives are considered in the FEIS, and the preferred alternative is selected. This Preferred Alternative (A4) starts at the Rosa Parks Transportation Center, moves south to serve the downtown business district along Congress and Larned Streets and then proceeds along Woodward Avenue out to Eight Mile Road. Five downtown stations south of I-75 and sixteen stations along Woodward Avenue north of I-75 would serve predominantly low income and minority populations. A Vehicle Storage Maintenance Facility and eight electrical Traction Power Stations are needed. The preferred Vehicle Storage Maintenance Facility location is at the former Highland Park Ford Plant. Most of the route will use a design running down the street center median.

Our review of the DEIS raised a number of concerns. The FEIS responded well to those concerns.

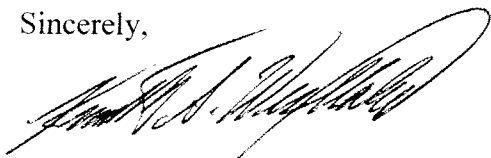
- The rationale for selection of the preferred alternative is clearly presented.
- Maps and text explain clearly what communities, institutions, and other facilities will be served.
- Potential historic site impacts are illustrated and explained, as well as the status of work toward addressing those impacts.
- Economic benefits to all communities along the proposed route are discussed.
- Train length and future system growth parameters and their impacts are considered.

- Traffic impacts of the new transit service are clearly presented.
- Impacts and benefits for station locations and use of median versus curbside track locations are noted, including implications for motorists, pedestrians, and bicyclists.
- Noise concerns were extensively considered.
- Electronic billboards were dismissed.
- Hazardous waste sites are more fully discussed, including future procedures to address them.

We commend the FEIS material for its discussion of the environmental justice (EJ) population this project will serve. We recommend the Record of Decision (ROD) address the issue of gentrification raised in that discussion. Because Detroit has endured significant economic setbacks, the FEIS notes that 96 percent of the census block groups within the project study area contain EJ populations. This project is intended to stimulate economic development in the Woodward Avenue corridor, which could include gentrification. We recommend the ROD discuss how the existing EJ populations will participate in and benefit from the economic development anticipated from this project, rather than being displaced by it.

We appreciate the opportunity to review and comment on this FEIS for the Detroit Woodward Avenue Light Rail Transit Project. Should you have any questions regarding these comments, please feel free to contact me or my staff member Norm West, at 312-353-5692 or west.norman@epa.gov.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

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